

# **EXHIBIT 14**

# EXHIBIT A

## UNITED STATES DISTRICT COURT FOR THE EASTERN DISTRICT OF MICHIGAN

**If You Purchased Compressors Directly from a Defendant Manufacturer between  
February 25, 2005 and December 31, 2008, you Could be Affected by Proposed Class  
Action Settlements.**

The fractional compressors in these settlements ("Compressors") are refrigerant compressors of less than one horsepower used for refrigeration purposes, such as in residential and commercial refrigerators, freezers, and water coolers, but do not include compressors that are used in air conditioning products.

*A federal court authorized this Notice. This is not a solicitation from a lawyer.*

- A class action lawsuit that includes direct purchasers of Compressors is currently pending. Proposed Settlements have been reached between direct purchasers of Compressors and the following Defendants: (1) Tecumseh Products Company, Tecumseh Compressor Company, Tecumseh do Brasil, Ltda. and their subsidiaries and affiliates (collectively "Tecumseh"); (2) Whirlpool S.A., Embraco North America, Inc. and their subsidiaries and affiliates (collectively "Embraco"); (3) Danfoss Flensburg GmbH, formerly Danfoss Compressors GmbH ("Danfoss Flensburg"); and (4) Panasonic Corporation f/k/a Matsushita Electric Industrial Co., Ltd., Panasonic Corporation of North America and their subsidiaries and affiliates (collectively "Panasonic"). These companies are together referred to as the "Settling Defendants."
- The litigation is continuing against the following Defendants: Appliance Components Companies SpA and ACC USA, LLC, but due to their insolvency it is unlikely that there will be a recovery from them. These companies are together referred to as the "Non-Settling Defendants." The Settling Defendants and Non-Settling Defendants, as well as Danfoss A/S, Danfoss, Inc., Danfoss Commercial Compressors, Ltd., Danfoss Scroll Technologies, and Danfoss Turbocor Compressors are referred to herein as "Defendants."
- Direct Purchaser Plaintiffs ("Plaintiffs") claim that Defendants engaged in an unlawful conspiracy to fix, raise, maintain, or stabilize the prices of Compressors. Plaintiffs allege that, as a result of the unlawful conspiracy, they and other direct purchasers paid more for Compressors than they would have paid absent the conspiracy. Defendants deny Plaintiffs' claims.
- Settlements now have been reached with the Settling Defendants. Approval of these Proposed Settlements by the Court will resolve this lawsuit as to the Settling Defendants.

Your Legal Rights And Options		
YOU MAY:		DUE DATE
<b>STAY IN THE CLASS</b>		
<b>SUBMIT A CLAIM</b>	The only way to get a payment is by submitting a claim. However, by submitting a claim against a Settling Defendant, you will give up your rights to ever be part of any other lawsuit against that Settling Defendant about the legal claims in this case.	June 9, 2014 (Postmarked)
<b>GO TO A HEARING</b>	Ask to speak to the Court about the fairness of the Proposed Settlements, the Plan of Allocation or the Request for Attorneys' Fees and Reimbursement of Expenses.	May 23, 2014 (received)
<b>OBJECT</b>	Write to the Court about why you don't like the Proposed Settlements, the Plan of Allocation or the Request for Attorneys' Fees and Reimbursement of Expenses.	May 23, 2014 (received)
<b>DO NOTHING</b>	Get no payment and give up your rights to ever be part of any other lawsuit against the Settling Defendants about the legal claims in this case.	
<b>EXCLUDE YOURSELF</b>	Get no payment. This is the only option that allows you to ever be part of any other lawsuit against a Settling Defendant about the legal claims in this case.	March 24, 2014 (postmarked)

- These rights and options – **and the deadlines to exercise them** – are explained in this Notice.
- Your legal rights will be affected whether you act or don't act. This Notice includes information on the litigation and regarding the Proposed Settlements with the Settling Defendants. Please read the entire Notice carefully.

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## **BASIC INFORMATION**

### **1. Why did I get this Notice?**

You or your company may have purchased Compressors directly from one or more Defendants during the period from and including February 25, 2005 up to and including December 31, 2008.

The Court sent you this Notice because, as a possible Class Member, you have the right to know about Proposed Settlements in this class action lawsuit, and about all your options, before the Court decides whether to approve the Proposed Settlements.

This Notice explains the litigation, the Proposed Settlements, and your legal rights.

The Court supervising the case is the United States District Court for the Eastern District of Michigan. The case is called *In re: Refrigerant Compressors Antitrust Litigation*, MDL No. 2:09-md-02042. The people who sued are the Plaintiffs, and the companies they sued are called Defendants. The Defendants that have agreed to these Proposed Settlements are called Settling Defendants.

### **2. What is this lawsuit about?**

The lawsuit alleges that Defendants conspired to raise and fix the prices of Compressors. The lawsuit claims that, as a result of this alleged conspiracy, purchasers paid more for Compressors than they otherwise would have paid. The operative complaint alleges that the Defendants violated U.S. antitrust laws by agreeing to set artificially high prices for and restrict the supply of Compressors.

Defendants have denied these claims and have asserted various defenses to the claims.

### **3. Who are the Defendants?**

The Defendants are: Embraco North America, Inc., Whirlpool S.A., Danfoss A/S, Danfoss, Inc., Danfoss Commercial Compressors, Ltd., Danfoss Compressor, LLC, Danfoss Scroll Technologies, LLC, Danfoss Flensburg GmbH, Danfoss Turbocor Compressors, Inc., Tecumseh Products Company, Tecumseh Compressor Company, Tecumseh do Brasil, Ltda., Panasonic Corporation, Panasonic Corporation of North America, Appliances Components Companies, SpA., and ACC USA, LLC.

### **4. Why is this a class action?**

In a class action, one or more individuals or companies, called Class Representatives, sue on behalf of others who have similar claims. The Class Representatives in this case are Appliance Parts Distributors, Inc., B&B Appliance Parts of Mobile, Inc., and Sanden Vendo America, Inc. The Class Representatives and the individuals or companies with similar claims are individually Class Members, together comprising a Class. One court resolves the settlement-related issues for all Class Members, except for those who exclude themselves from the Class. U.S. District Judge Sean F. Cox is in charge of this class action.

### **5. Why are there Proposed Settlements?**

The Settling Defendants have denied all liability in this case and have asserted various defenses to the Plaintiffs' claims. The Court did not decide in favor of the Plaintiffs or the Settling Defendants. Instead, both sides agreed to the Proposed Settlements. That way, they avoid the cost and risk of a trial, and the Settlement Class Members will get compensation if they do not exclude themselves from the Class and satisfy certain requirements stated in this Notice. The Class Representatives and Class Counsel think the Proposed Settlements are best for all Class Members. The case is proceeding against other Defendants.

## **WHO IS AFFECTED BY THE PROPOSED SETTLEMENTS?**

To see if you are affected by these Proposed Settlements, you first have to determine if you are a Settlement Class Member. See Questions 6 and 7 below.

### **6. How do I know if I am part of the Proposed Settlements?**

Judge Cox decided that everyone who fits this description is a Class Member for settlement purposes only:

All persons or entities (but excluding government entities and Defendants, their officers, directors and employees, as well as Defendants' parents, predecessors, successors, subsidiaries, or affiliates) who purchased Compressors in the United States, its territories and possessions, directly from any Defendant, including Settling Defendants, or from any of their parents, predecessors, successors, subsidiaries, or affiliates, at any time during the period from and including February 25, 2005 up to and including December 31, 2008. Compressors include compressors of less than one horse power, excluding compressors used in air conditioning.

### **7. I'm still not sure if I am included.**

If you are still not sure if you are a Class Member, you can ask for free help. See Question 25 below. You are not required to pay anyone to assist you in filing a claim.

## THE PROPOSED SETTLEMENT BENEFITS

### 8. What do the Proposed Settlements provide?

The Proposed Settlements provide for a total cash payment of up to \$48.4 million (the "Settlement Fund").

Under the Embraco Settlement, Embraco has agreed to pay up to \$30 million in cash and an additional \$500,000 for cost of notice of the Embraco Settlement. If any Class Member excludes itself from the Embraco Settlement, the Embraco Settlement will be reduced based on the amounts of their purchases. In addition, under certain circumstances, either Plaintiffs or Embraco have the right to withdraw from the Settlement. This process is explained in paragraphs 32 and 46-49 of the Embraco Settlement Agreement.

Under the Tecumseh Settlement, Tecumseh has agreed to pay \$7 million in cash (plus interest) and an additional \$150,000 for cost of notice of the Tecumseh Settlement. That amount will not be reduced because of Class Members who exclude themselves from the Class, but under certain circumstances Tecumseh has the right to withdraw from the Settlement.

Under the Danfoss Settlement, Danfoss Flensburg has agreed to pay \$3.5 million in cash (plus interest). That amount will not be reduced because of Class Members who exclude themselves from the Class, but under certain circumstances Danfoss Flensburg has the right to withdraw from the Settlement. Danfoss Flensburg has also agreed to pay up to an additional \$100,000 for costs of notice and administration.

Under the Panasonic Settlement, Panasonic has agreed to pay \$7.9 million in cash (plus interest). This amount will not be reduced because of Class Members who exclude themselves from the Class.

Under certain of the Proposed Settlements, the Settling Defendants will also provide cooperation in Plaintiffs' continuing litigation, if any, against the other remaining Defendants, if any. Depending on the Settling Defendant, this cooperation may include meetings with their counsel, production of documents and data, and witness interviews and testimony. Details about the cooperation are set forth in the Settlement Agreements.

All of the Settlement Agreements have been filed with the Court and may be viewed at [www.CompressorsSettlement.com](http://www.CompressorsSettlement.com).

### 9. How do I get a payment?

If you are a Settlement Class Member and did not exclude yourself from the Class, you are eligible to get a payment. If the Court approves the Settlements (see "The Court's Fairness Hearing" below), the Court will also approve a Claim Form and set a deadline for Class Members to submit claims. In order to receive a payment, you must submit a Claim Form. If you received this Notice in the mail, a Claim Form should be included in the Notice Packet. You may also request a Claim Form online at [www.CompressorsSettlement.com](http://www.CompressorsSettlement.com), or by calling the Claims Administrator toll-free at 800-961-8035.

Completed Claim Forms must be postmarked by June 9, 2014 and returned to the Claims Administrator at the following address:

Compressors Settlement  
c/o GCG  
P.O. Box 9662  
Dublin, OH 43017-4962

If you do not mail a timely, properly addressed, completed and valid Claim Form, your claim may be rejected and you may not be able to get any payment.

You must keep all of your records of your purchases of Compressors from Defendants and Settling Defendants because you will need them to complete the Claim Form and may later be asked to provide them to Class Counsel or the Claims Administrator.

### 10. How much will my payment be?

Class Counsel has proposed a Plan of Allocation describing the division of the Settlement Fund. If you have excluded yourself from one or more of the Settlements, you will not be able to share in those Settlements but can only share in Settlements from which you have not excluded yourself.

Under the Plan of Allocation, the Settlement Fund (following any reductions for Class Members that exclude themselves from the Embraco Settlement) will first be used to pay attorneys' fees, incentive payments to the three Class Representatives, and expenses approved by the Court. The remaining amount (the "Net Settlement Fund") will be distributed to Class Members that submit valid and timely claims.

The Net Settlement Fund will be distributed to Settlement Class Members on a pro rata basis among all Settlement Class Members who submit valid and timely Claim Forms. In other words, each Settlement Class Member shall be paid a percentage of a Net Settlement Fund that each Settlement Class Member's recognized claim for that Net Settlement Fund bears to the total of all recognized claims for that Net Settlement Fund.

If a Settlement Class Member excludes itself from one or more of the Settlements but not all four of the Settlements, it will not be able to share in the Net Settlement Fund or Funds for the Settlement or Settlements from which it has opted out.

If you wish to object to the Plan of Allocation, you must file your objection by May 23, 2014 as described in Question 18 below.



**11. When will I receive a payment?**

The Net Settlement Funds will be distributed to Settlement Class Members after the Claim Forms are processed and the Court has authorized distribution.

**12. What am I giving up to get a payment or stay in the Class?**

Unless you exclude yourself from a specific Settlement, you are staying in the Class, and that means that you can't sue, continue to sue, or be part of any other lawsuit against that Settling Defendant regarding the legal issues in this case. This is called a release. It also means that all of the Court's orders will apply to you and legally bind you.

In exchange for the consideration provided, the Settlement Agreements stipulate that there will be a release of claims against the Settling Defendants and the Released Parties (as defined in the respective Settlement Agreements). The Agreements, however, do not release any Claims involving any (a) direct or indirect purchase of Compressors outside the United States, or its territories or possessions under the laws of any foreign jurisdiction; (b) indirect purchase of Compressors in the United States; or (c) alleged product defect or breach of contract unrelated to the released claims set forth in the Agreements, or similar commercial claim between any of the Released Parties and any of the Direct Purchaser Plaintiffs relating to Compressors. (Tecumseh Agreement ¶ 29; Embraco Agreement ¶ 28; Danfoss Agreement ¶ 28; Panasonic Agreement ¶ 25). Each of the Settlement Agreements provides the specific and full terms of the releases as to each of the Settling Defendants, but broadly the Agreements completely release, acquit, and forever discharge the Settling Defendants and the Released Parties from any and all other claims arising at any time prior to the execution date of the respective Settlement Agreements under antitrust, unfair competition, or similar statutes relating to the supply, pricing, marketing, distribution, and sale of Compressors by the Settling Defendants or any Defendants in the U.S. or its territories or possessions.

The Settlement Agreements, which are available at [www.CompressorsSettlement.com](http://www.CompressorsSettlement.com), describe the exact legal claims that you give up if you stay in the Class.

**EXCLUDING YOURSELF FROM THE PROPOSED SETTLEMENTS**

If you want to keep the right to sue or continue to sue one or more of the Settling Defendants, on your own, regarding the legal issues in this case, then you must take steps to get out of the Settlement(s) with those Settling Defendant(s). This is called excluding yourself—or sometimes referenced as opting out of the Class. If you opt out of a Settlement, you will not get any payment from that Settlement.

**13. How do I exclude myself from the Proposed Settlements?**

To exclude yourself from one or more of the Proposed Settlements, you must send a letter saying that you want to be excluded from the Settlement Class. The letter must include the following information:

- A statement indicating that you want to be excluded from the Settlement Class.
- Which Proposed Settlement(s) you want to be excluded from: the Embraco Settlement, the Tecumseh Settlement, the Danfoss Settlement, the Panasonic Settlement or from all four Settlements. **Your request for exclusion may not be effective if you do not specify the specific Proposed Settlement(s) from which you are seeking exclusion.**
- The case name: *In re: Refrigerant Compressors Antitrust Litigation*.
- Your company name, address and telephone number, and the name, title and signature of an authorized officer, director or owner
- All trade names or business names and addresses you or your business have used, as well as any subsidiaries or affiliates who are requesting to be excluded from the Class.

Your letter must be postmarked by March 24, 2014 and sent to:

Compressors Settlement  
c/o GCG  
P.O. Box 9662  
Dublin, OH 43017-4962

**If you ask to be excluded from any of the Proposed Settlements, you will not get any payment from any Settlement from which you exclude yourself, and you cannot object to a Settlement from which you excluded yourself.**

Unless you exclude yourself, you give up any right to sue the Settling Defendants for the claims that the Proposed Settlements resolve. If you have a pending lawsuit against the Settling Defendants involving the same legal issues in this case, speak to your lawyer in that case immediately. (You must exclude yourself from *this* Class in order to continue your own lawsuit against the Settling Defendants).

**14. Can I remain as part of the Class for some of the Proposed Settlements and exclude myself from others?**

Yes. Because there are four separate Proposed Settlements (the Embraco Settlement, the Tecumseh Settlement, the Danfoss Settlement and the Panasonic Settlement), you will need to decide, for each of the Proposed Settlements, whether to exclude yourself from the Settlement Class, or whether to remain in the Class for any or all of them.

**15. If I exclude myself, can I get money from the Proposed Settlements?**

No. If you decide to exclude yourself from a Proposed Settlement, you will not be able to get money from that Proposed Settlement. If you exclude yourself from some, but not all, of the Proposed Settlements, you will be eligible to receive payment from the Proposed Settlements for which you remain in the Settlement Class.

**THE LAWYERS REPRESENTING YOU****16. Do I have a lawyer in this case?**

Yes. The Court has appointed Class Counsel, David H. Fink of Fink + Associates Law and E. Powell Miller of The Miller Law Firm, P.C., to represent the Class. You will not be charged for these lawyers. If you want to be represented by your own lawyer and have that lawyer appear in court for you in this case, you may hire one at your own expense.

**17. How will the lawyers be paid?**

You are not personally responsible for payment of attorney's fees or expenses for Class Counsel. Instead, as compensation for their time and risk in litigating the case on a contingent basis, Class Counsel will ask the Court to approve from the Settlement Fund payment of attorney's fees amounting to up to 30% of the Settlement Fund after any reduction of the Embraco Settlement Fund due to opt-outs, as well as reimbursement for costs and expenses incurred in the prosecution of the lawsuit not to exceed \$500,000. Class Counsel will also ask the Court to approve from the Settlement Fund incentive payments of \$7,500 for each of the three Class Representatives named above in Question 4.

You can tell the Court that you don't agree with the Proposed Settlements or some part of them, or the Plan of Allocation or the Request for Attorneys' Fees and Reimbursement of Expenses.

**OBJECTING TO THE PROPOSED SETTLEMENTS, PLAN OF ALLOCATION AND REQUEST FOR ATTORNEYS' FEES AND REIMBURSEMENT OF EXPENSES****18. How do I tell the Court I don't like the Proposed Settlements, Plan of Allocation or Request for Attorneys' Fees and Expenses?**

You can object to any Proposed Settlement in which you are a member of the Settlement Class and have not opted out of the Settlement Class. You can object if you don't like any part of the Proposed Settlements, or if you disagree with the Plan of Allocation or the Request for Attorneys' Fees and Reimbursement of Expenses. You can give reasons why you think the Court should not approve any or all of them. The Court will consider your views.

To object, you must send a letter to the Court that includes the following:

- A statement indicating that you object to one or more of the Proposed Settlements, or the Plan of Allocation or the Request for Attorneys' Fees and Reimbursement of Expenses, in *In re: Refrigerant Compressors Antitrust Litigation*.
- Your company name, address and telephone number, and the name, title and signature of an authorized officer, director or owner.
- The reasons you object.
- Proof of your membership in the Class, such as invoices showing that you satisfy the definition in Question 6.

You must file the objection with the Court at the following address, received by May 23, 2014:

Clerk of Court  
United States District Court  
for the Eastern District of Michigan  
231 W. Lafayette Blvd, Room 564  
Detroit, Michigan 48226

You must also mail copies of the objections to the following attorneys, postmarked by May 23, 2014:

Lead Class Counsel	
David H. Fink Fink + Associates Law 100 West Long Lake Road, Suite 111 Bloomfield Hills, MI 48304	E. Powell Miller The Miller Law Firm, P.C. 950 West University Drive, Suite 300 Rochester, MI 48307
Robert N. Kaplan Kaplan Fox & Kilsheimer LLP 850 Third Avenue, 14 <sup>th</sup> Floor New York, NY 10022	Michael D. Hausfeld Hausfeld LLP 1700 K Street, N.W., Suite 650 Washington, DC 20006



Counsel for Embraco	
Brian Byrne Cleary Gottlieb Steen & Hamilton LLP 2000 Pennsylvania Avenue, NW Washington, DC 20006	Howard Iwrey Dykema Gossett PLLC 39577 Woodward Ave., Suite 300 Bloomfield Hills, MI 48304-2820
Counsel for Danfoss	
James M. Andriola Reed Smith LLP 599 Lexington Avenue, 22nd Floor New York, NY 10022	
Counsel for Tecumseh	
Edward A. Geltman Squire Sanders (US) LLP 1200 19 <sup>th</sup> Street, NW, Suite 300 Washington, DC 20036	David A. Ettinger Honigman Miller Schwartz & Cohn 660 Woodward Avenue 2290 First National Building Detroit, MI 48226-3507
Counsel for Panasonic	
Jeffrey L. Kessler Winston & Strawn LLP 200 Park Avenue, #4511 New York, NY 10166	Matthew L. Powell Kerr, Russell and Weber, PLC 500 Woodward Avenue, Suite 2500 Detroit, MI 48226

#### 19. What is the difference between objecting and excluding?

Objecting is simply telling the Court that you don't like something about the Proposed Settlements or Plan of Allocation or the Request for Attorneys' Fees and Reimbursement of Expenses. You can object to a Proposed Settlement only if you stay in the Class for that particular Proposed Settlement. If you exclude yourself, you have no right to object because the Proposed Settlement no longer affects you.

#### THE COURT'S FAIRNESS HEARING

The Court will hold a fairness hearing to decide whether to approve the Proposed Settlements, the Plan of Allocation and the Request for Attorneys' Fees and Reimbursement of Expenses. You may attend but need not attend. If you do attend you may ask the Court's permission to speak, but you don't have to participate in the hearing if you do attend. See Questions 20 through 22 for details.

#### 20. When and where will the Court decide whether to approve the Proposed Settlements?

The Court will hold a Fairness Hearing at 2:00 p.m. on June 12, 2014, at the United States District Court for the Eastern District of Michigan, 231 W. Lafayette Blvd., Courtroom 257, Detroit, Michigan 48226. The hearing may be moved to a different date or time without additional notice, so you should check the settlement website [www.CompressorsSettlement.com](http://www.CompressorsSettlement.com) before making any travel plans. At the Fairness Hearing, the Court will consider whether the Proposed Settlements are fair, reasonable, and adequate and whether to approve the Plan of Allocation and the Request for Attorneys' Fees and Reimbursement of Expenses. If there are objections, the Court will consider them. Judge Cox will listen to Class Members who have asked to speak at the hearing. If there are objections or comments, the Court will consider them at this time. After the hearing, the Court will decide whether to approve the Proposed Settlements, the Plan of Allocation and the Request for Attorneys' Fees and Reimbursement of Expenses. We do not know how long this decision will take.

#### 21. Do I have to come to the hearing?

No. Class Counsel will be prepared to answer any questions the Court may have at the hearing. However, you are welcome to attend the hearing at your own expense. If you send a comment or objection, you do not have to come to court to explain. As long as you mailed your written comment or objection on time as set out in this Notice, the Court will consider it. You may also pay another lawyer to attend, but it's not required.

**22. May I speak at the hearing?**

Yes. You may ask the Court for permission to speak at the Fairness Hearing. If you wish to do so, you are encouraged to send a letter stating the following:

- "Notice of Intention to Appear in *In re: Refrigerant Compressors Antitrust Litigation*, MDL No. 2:09-md-02042"
- The position you will take and your reasons.
- Your company name, address and telephone number, and the name, title and signature of an authorized officer, director or owner.
- Proof of your membership in the Class, such as invoices showing that you satisfied the definition in Question 6.

Your Notice of Intention to Appear must be filed with the Court at the following address, received by May 23, 2014:

Clerk of Court  
United States District Court  
for the Eastern District of Michigan  
231 W. Lafayette Blvd, Room 564  
Detroit, Michigan 48226

You must also mail copies of the Notice of Intention to Appear to the attorneys listed in Question 18 above, no later than May 23, 2014.

**IF YOU DO NOTHING**

**23. What happens if I do nothing at all?**

If you do nothing, you will remain in the Settlement Class for each of the Proposed Settlements, but you will not receive a payment unless you submit a Claim Form. To submit a Claim Form, follow the instructions described in Question 9.

**GETTING MORE INFORMATION**

**24. Are there more details about the Proposed Settlements or Plan of Allocation?**

This Notice summarizes the Proposed Settlements. More details are in the Settlement Agreements. You can get a copy of the Settlement Agreements by visiting [www.CompressorsSettlement.com](http://www.CompressorsSettlement.com).

Class Counsel will file a motion for final approval of the Proposed Settlements, the Plan of Allocation and the Request for Attorneys' Fees and Reimbursement of Expenses, which will contain additional information. These papers are currently due to be filed by May 13, 2014, and will be available at [www.CompressorsSettlement.com](http://www.CompressorsSettlement.com).

**25. How do I get more information?**

If you have questions or want more information, you can visit the official settlement website at [www.CompressorsSettlement.com](http://www.CompressorsSettlement.com); contact the Claims Administrator toll-free at 800-961-8035; or write to any of the following counsel for Plaintiffs:

David H. Fink Fink + Associates Law 100 West Long Lake Road, Suite 111 Bloomfield Hills, MI 48304	E. Powell Miller The Miller Law Firm, P.C. 950 West University Drive, Suite 300 Rochester, MI 48307
Robert N. Kaplan Kaplan Fox & Kilsheimer LLP 850 Third Avenue, 14 <sup>th</sup> Floor New York, NY 10022	Michael D. Hausfeld Hausfeld LLP 1700 K Street, N.W., Suite 650 Washington, DC 20006

DATED: January 9, 2014

BY ORDER OF THE COURT  
UNITED STATES DISTRICT COURT  
FOR THE EASTERN DISTRICT OF  
MICHIGAN

**MUST BE  
POSTMARKED NO  
LATER THAN  
JUNE 9, 2014**

**Compressors Settlement  
c/o GCG  
P.O. Box 9662  
Dublin, OH 43017-4962  
Toll-Free: 1 (800) 961-8035**

**RCP**



Control No:  
Claim No:

RCP01234567



JANE CLAIMANT  
123 4TH AVE  
APT 5  
SEATTLE, WA 67890

**REQUIRED ADDRESS INFORMATION OR CORRECTIONS**

If the pre-printed address to the left is incorrect or out of date,  
OR if there is no pre-printed data to the left, YOU MUST provide  
your current name and address here:

Name:

Address:

City/State/ZIP:

**CLAIM FORM**

**GENERAL INSTRUCTIONS**

A class action lawsuit that includes direct purchasers of Compressors is currently pending. Proposed Settlements have been reached between direct purchasers of Compressors and the following Defendants: (1) Tecumseh Products Company, Tecumseh Compressor Company, Tecumseh do Brasil, Ltda. and their subsidiaries and affiliates (collectively "Tecumseh"); (2) Embraco North America, Inc., Whirlpool S.A. and their subsidiaries and affiliates (collectively "Embraco"); (3) Danfoss Flensburg GmbH, formerly Danfoss Compressors GmbH ("Danfoss Flensburg"); and, (4) Panasonic Corporation f/k/a Matsushita Electric Industrial Co., Ltd., Panasonic Corporation of North America and their subsidiaries and affiliates (collectively "Panasonic"). These companies are together referred to as the "Settling Defendants."

The litigation is continuing against the following Defendants: Appliance Components Companies SpA and ACC USA, LLC. These companies are together referred to as the "Non-Settling Defendants." The Settling Defendants and Non-Settling Defendants, as well as Danfoss A/S, Danfoss, Inc., Danfoss Commercial Compressors, Ltd., Danfoss Scroll Technologies, and Danfoss Turbocor Compressors, are referred to herein as "Defendants."

Under the terms of the proposed Settlements, the Settling Defendants have agreed to pay up to a collective total of \$48.4 million in cash (the "Settlement Fund"). Class Counsel has proposed a Plan of Allocation describing the division of the Settlement Fund. If you have excluded yourself from one or more of the Settlements, you will not be able to share in those Settlements but can share in Settlements from which you have not excluded yourself.

Under the Plan of Allocation, the Settlement Funds, following reductions, if any, related to Settlement Class Members who exclude themselves, will first be used to pay attorneys' fees, incentive payments to the three Class Representatives, and expenses approved by the Court. The remaining amounts (the "Net Settlement Funds") will be distributed to Settlement Class Members that submit valid and timely claims.

If you are a member of the Settlement Class (and have not excluded yourself from the Settlement Class), you may be entitled to share in the distribution of the Net Settlement Funds in this litigation as described below. To receive your share of the Net Settlement Fund, you must submit a timely and valid Claim Form in accordance with these instructions.

The Net Settlement Funds shall be distributed to Settlement Class Members on a pro rata basis among all Settlement Class Members who submit a valid and timely Claim Form and who have not excluded themselves from the relevant Settlement. In other words, each Settlement Class Member shall be paid a percentage of each Net Settlement Fund that the Settlement Class Member's recognized claim for that Net Settlement Fund bears to the total of all recognized claims for that Net Settlement Fund. If a Settlement Class Member excludes itself from one or more of the Settlements but not all four of the Settlements, it will share in distributions from the Net Settlement Fund or Funds related to the Settlement or Settlements that it has not excluded itself from, but it will not share in a Net Settlement Fund or Funds if it has excluded itself from that Settlement.





Before you complete and mail the Claim Form you should read and be familiar with the Notice of Proposed Class Action Settlements (the "Notice"). Defined terms (with initial capitals) used in these General Instructions have the same meaning as set forth in the Notice. By submitting the Claim Form, you acknowledge that you have read and understand the Notice and you have agreed to the Release of Claims outlined in each of the four Settlement Agreements. If you decide not to submit a Claim Form and do not exclude yourself from Settlement(s), you will likewise release the Settling Defendants of all Claims, as outlined in the respective Settlement Agreements. A copy of the Settlement Agreements and the Notice are available for your review and can be downloaded at [www.CompressorsSettlement.com](http://www.CompressorsSettlement.com).

Settlement Class Members who seek payment from the Settlement Funds must complete and return the Claim Form. It must be **POSTMARKED NO LATER THAN JUNE 9, 2014**. Completed Claim Forms must be mailed to the Claims Administrator at the following address:

Compressors Settlement  
c/o GCG  
P.O. Box 9662  
Dublin, OH 43017-4962

You should save all documents supporting your claim because you may be required to provide them later. If you fail to mail a timely, properly addressed and valid Claim Form, your claim may be rejected and you may be precluded from any recovery from the Settlement Funds. If you are a member of the Settlement Class and you did not timely and validly seek exclusion from the Settlement Class, you will be bound by any judgment entered by the Court approving the Settlements regardless of whether you submit a Claim Form.

#### SECTION A - CLAIMANT INFORMATION

Claimant Name(s) (as you would like the name(s) to appear on the check, if eligible for payment):

#### Claimant or Representative Contact Information:

The Claims Administrator will use this information for all communications relevant to this claim (including the check, if eligible for payment). If this information changes, you **MUST** notify the Claims Administrator in writing at the address above or online at [www.CompressorsSettlement.com](http://www.CompressorsSettlement.com).

Name of the person you would like the Claims Administrator to contact regarding this claim (if different from the Claimant Name(s) listed above):

Street Address:

  


City:

State:

ZIP Code:

Country:

Daytime Telephone Number:

Evening Telephone Number:

Email Address:

(Email address is not required, but if you provide it you authorize the Claims Administrator to use it in providing you with information relevant to this claim.)

QUESTIONS? CALL TOLL-FREE 1 (800) 961-8035 OR VISIT [WWW.COMPRESSORSSETTLEMENT.COM](http://WWW.COMPRESSORSSETTLEMENT.COM)

To view GCG's Privacy Notice, please visit <http://www.gcginc.com/pages/privacy-policy.php>



IF YOU FAIL TO SUBMIT A VALID AND PROPERLY ADDRESSED COMPLETE CLAIM FORM BY JUNE 9, 2014, YOUR CLAIM IS SUBJECT TO REJECTION OR YOUR PAYMENT MAY BE DELAYED.

**SECTION B - SCHEDULE OF QUALIFYING DIRECT PURCHASES OF COMPRESSORS IN THE UNITED STATES**

The Compressors included in the Settlements are fractional refrigerant compressors (meaning those less than one horsepower) used for refrigeration purposes, such as in residential and commercial refrigerators, freezers, and water coolers. The Settlements do not relate to compressors that are used in air conditioning products. The Settlements cover purchases of Compressors during the period February 25, 2005 through December 31, 2008 (the "Class Period")

In the following table, list the dollar amount (in U.S. dollars) of your purchases of Compressors in the United States from one or more Defendants during the Class Period. If you did not purchase compressors from a Defendant during a particular year, write "none." Round the total purchase amount to the nearest dollar. When writing out the total purchase amount, please use both numbers and words, in the following format: \$6,234 = Six thousand two hundred thirty-four dollars.

	2/25/2005 - 12/31/2005	2006  (full year)	2007  (full year)	2008  (full year)
Embraco (Including Embraco North America, Inc., Whirlpool S.A. and their subsidiaries and affiliates)				
Tecumseh (Including Tecumseh Products Company, Tecumseh Compressor Company, Tecumseh do Brasil, Ltda. and their subsidiaries and affiliates)				
Danfoss (Including Danfoss Flensburg, GmbH, Danfoss A/S, Danfoss, Inc., Danfoss Commercial Compressors, Ltd., Danfoss Scroll Technologies, and Danfoss Turbocor Compressors)				
ACC (Including Appliances Components Companies SpA and ACC USA, LLC)				
Panasonic (Including Panasonic Corporation f/k/a Matsushita Electric Industrial Co., Ltd., Panasonic Corporation of North America and their subsidiaries and affiliates)				





**SECTION C - SUBMISSION TO JURISDICTION OF THE COURT**

By signing below, you are submitting to the jurisdiction of the United States District Court for the Eastern District of Michigan for purposes of these Settlements only.

**SECTION D - CERTIFICATION UNDER PENALTY OF PERJURY**

I hereby certify under penalty of perjury that:

1. The information provided in the Claim Form is accurate and complete to the best of my knowledge, information and belief;
2. I have documentation to support my claim and agree to provide additional information to Settlement Class Counsel or the Claims Administrator to support my claim if requested;
3. I am either (a) a member of the Settlement Class and did not request to be excluded from the Settlement Class or (b) the assignee or transferee of, or the successor to, the claim of a member of the Settlement Class and did not request to be excluded from the Settlement Class;
4. I am neither a Defendant, nor a parent, officer, director, employee, subsidiary or affiliate of a Defendant;
5. I am not a government entity;
6. I have not assigned or transferred (or purported to assign or transfer) or submitted any other claim for the same purchases of Compressors and have not authorized any other person or entity to do so, and know of no other person or entity having done so on my behalf; and
7. I have the authority to execute this Certification.

Dated: \_\_\_\_\_

\_\_\_\_\_  
SIGNATURE

\_\_\_\_\_  
PRINTED NAME OF PERSON SIGNING FOR CLAIMANT

\_\_\_\_\_  
TITLE OR POSITION OF PERSON SIGNING

\_\_\_\_\_  
PRINTED NAME OF CLAIMANT